

# Exhibit B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

SHOSHANTI BARJO,

Plaintiff,

v.

VIVIAN R. CHERIAN, et al.,

Defendants.

**Case No. 8:18-cv-01587-RWT**

**DECLARATION OF PLAINTIFF SHOSHANTI BARJO  
IN SUPPORT OF EMERGENCY MOTION FOR A PROTECTIVE ORDER**

I, Shoshanti Barjo, declare under penalty of perjury as follows:

1. My name is Shoshanti Barjo. I am 42 years old, and I live in Virginia.
2. Everything I alleged in the Complaint in this case is true to my knowledge.
3. I was held captive in the Cherians' home and in their business, Aberdeen House, for fifteen years.
4. During the entirety of my captivity, the Cherians constantly made me feel scared, belittled, and demeaned. I could not speak in my own defense, and I could not ask for anyone's help. Whenever I tried, Vivian or Ken Cherian would get angry at me. They constantly told me that only they—and no one else—could help me, and made me feel like I could never ask for anything.
5. By using fear and manipulation, the Cherians controlled me and prevented me from seeking help or speaking for myself.
6. Even in the present, I am traumatized. I am always scared they will come find me, or that I will see them again. These fears are like panic attacks.

7. On May 11, 2018, two days after my attorney sent the Cherians a demand letter for my compensation, I received a phone call from an unknown number. I did not pick it up at the time, and I received a voicemail. The voicemail said, "I know you don't have papers, so if you don't call me right away, I will make sure the police will arrest you," or something to that effect. I believe the caller was a woman.

8. I was so terrified when I got that phone call. I was scared of even leaving the house. I am scared that I got the phone call because my attorneys sent a demand letter to the Cherians on my behalf.

9. If I saw the Cherians now, I would be terrified. I am scared the Cherians will threaten me or yell at me again or hurt me. Even if they do not speak to me, the sight of them would traumatize me, and make me feel as if I were back in their home again. I would feel scared, nervous, and unable to speak for myself or on my own behalf.

Dated: February 7, 2019

/s/ Shoshanti Barjo  
Shoshanti Barjo